

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of)	
)	MM Docket No. 04-232
Retention by Broadcasters of)	
Program Recordings)	

To: The Commission

**STATEMENT IN SUPPORT OF
MOTION FOR EXTENSION OF COMMENT
AND REPLY COMMENT DATES**

On behalf of Beasley Broadcast Group, Inc., Citadel Broadcasting Corporation, Entercom Communications Corp., Galaxy Communications, LP, Multicultural Radio Broadcasting, Inc. and Sarkes Tarzian, Inc. (collectively, the “*Broadcast Licensees*”), by their attorneys, this statement is filed in support of the *Motion for Extension of Comment and Reply Comment Dates* (the “*Motion*”) filed in the above-captioned proceeding on July 16, 2004 by the Arizona Broadcasters Association and the Kentucky Broadcasters Association. The Motion requests that the deadline for filing comments and reply comments in this proceeding be extended through September 13, 2004 and October 14, 2004, respectively. For the reasons set forth below, the Broadcast Licensees concur in and support the Motion and respectfully urge that the Commission extend the filing dates as proposed.


Despite the breadth and significance of the issues that are pertinent to this proceeding, the Commission has without explanation afforded barely more than three weeks from the issuance of the *Notice of Proposed Rulemaking* for the filing of comments. Additional time is required in order to research and evaluate the capital expenses, administrative demands and other costs that

would be required to comply with the proposed rules, especially as those burdens may be different for radio and television operations and for analog and digital broadcasts. Furthermore, the additional time requested will facilitate the development of a comprehensive record and legal analysis relevant to the proposed rules regarding substantive First Amendment and other Constitutional issues. Given the importance of these factors, and the absence of any emergency condition demanding the extremely expedited comment schedule established by the Commission, the Broadcast Licensees submit that good cause exists for the extension of the filing dates requested.

WHEREFORE, the Broadcast Licensees join the Arizona Association of Broadcasters and the Kentucky Association of Broadcasters in respectfully requesting that the Commission extend the date for filing comments in this proceeding through September 13, 2004, and for filing reply comments through October 14, 2004.

Respectfully submitted,

BEASLEY BROADCAST GROUP, INC.
CITADEL BROADCASTING CORPORATION
ENTERCOM COMMUNICATIONS CORP.
GALAXY COMMUNICATIONS, LP.
MULTICULTURAL RADIO BROADCASTING, INC.
SARKES TARZIAN, INC.

By: 

Brian M. Madden, Esq.
Sally A. Buckman, Esq.
Leventhal Senter & Lerman, PLLC
2000 K Street, NW, Suite 600
Washington, DC 20006
(202) 429-8970

Their Attorneys

July 20, 2004